

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (SN)
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This document relates to:

All Actions

DECLARATION OF JAMES GAVIN SIMPSON

I, James Gavin Simpson, pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury the following:

1. I am an attorney duly admitted to practice before this Court, working as a consultant to Kreindler & Kreindler LLP (“Kreindler”) on behalf of the family members of those killed in the 9/11 Terrorist Attacks, as well as the survivors of those attacks. I am familiar with the history of this lawsuit and this Court’s inquiry into the Yahoo! News article published by Michael Isikoff on July 15, 2021.

2. My specific answers to the inquiry of this Court’s Order (set forth in italics) are underscored below:

- *identify all communications with Michael Isikoff or anyone acting on his behalf, whether oral or written, from June 1, 2021, to August 1, 2021. Any written communication must be provided to the Court;*
 - I had no communications with Michael Isikoff or anyone acting on his behalf.
- *declare whether they have ever discussed the contents of the Musaed Al Jarrah deposition with Michael Isikoff or anyone acting on his behalf. Any*

communication must be described in detail, including whether portions of the transcript were read or testimony was described;

- I have not discussed the contents of the deposition with Michael Isikoff or anyone acting on his behalf.
- *state every person with whom they shared the Al Jarrah deposition transcript who has not already supplied the Court with a declaration in this investigation;*
 - None.
- *state every person that they know had access to the deposition transcripts who has not already supplied a declaration in this investigation.*
 - None.

3. For the first time today I learned the information set forth in the declaration of John Fawcett.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: New York, New York
September 27, 2021

KREINDLER & KREINDLER LLP

By: /s/ James Gavin Simpson
James Gavin Simpson
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